



DEPARTMENT OF THE NAVY

NAVAL BASE

NORFOLK, VIRGINIA 23511-6002

NBN-00421
101-9-17-90

IN REPLY REFER TO:

17 September 1990

MEMORANDUM

From: Director, Environmental Programs Division, Naval Base Norfolk, (N9E)

Subj: RCRA FACILITY ASSESSMENT (RFA)

1. I appreciate everyone's help with the Visual Site Inspection portion of the RFA conducted this past week. In particular, your efforts to meet the inspectors at potential SWMU sites, answer their questions, and provide additional information as needed led them to state that this was one of the best-organized inspections they had been involved with.

2. Although we did not schedule a formal out-brief, David Turner of EPA did meet briefly with CAPT Norton on Thursday, 13 September. The following is an outline of what was discussed.

a. We can expect to see a draft RFA report in 5-6 weeks for comment. We will not get the conclusions and recommendations section of the report, as EPA considers those to be unofficial statements by a contractor and unreleasable. We will, however, get a list of sites identified during the inspection with accompanying descriptions.

b. We will get the second draft of the RFA that incorporates our comments.

c. We will be revisited early to mid-92 by David Turner. We will get to see site fact sheets and EPA's recommendations during that timeframe.

d. We will have a chance to comment on the recommendations during a mandatory 45-day comment period before the permit is issued (November 1992 or later). Although EPA has final say on what we'll have to do at each site, we can appeal the permit if we don't agree with the conditions.

e. It is particularly important that we keep good records of any cleanups done at these sites in the interim (both cleanups done to restore the environment and those to facilitate construction). We can and should send EPA data and documentation of any cleanups. They can comment but not give formal approval to our efforts.

3. We will distribute the RFA report for your comments as soon as it is



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received. Please coordinate any cleanup or other work at identified SWMUs with Sharon Waligora, 4-3009.

Cheryl Barnett
CHERRY BARNETT

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